

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In Re:	: Bankruptcy No. 17-12235-sr
Colette L Jackson	: Chapter 13
Debtor	:
	:
	:
U.S. Bank National Association, as Trustee	:
for the Structured Asset Investment Loan	:
Trust Mortgage Pass-Through Certificates,	:
Series 2005-2 c/o Select Portfolio Servicing,	:
Inc.	:
	:
Movant	:
	:
vs.	:
	:
Colette L Jackson	:
	:
Debtor/Respondent	:
	:
and	:
	:
Frederick L. Reigle, Esquire	:
Trustee/Respondent	:

**OBJECTION TO CONFIRMATION OF THE PLAN**

Movant, U.S. Bank National Association, as Trustee for the Structured Asset Investment Loan Trust Mortgage Pass-Through Certificates, Series 2005-2 c/o Select Portfolio Servicing, Inc. (“Movant”), by its attorneys, Hladik, Onorato & Federman, LLP, objects to confirmation of the Chapter 13 Plan of Debtor, Colette L. Jackson (“Debtor”), as follows:

1. As of the bankruptcy filing date of March 31, 2017, Movant holds a secured claim against the Debtor’s property, located at: 5830 Haverford Avenue, Philadelphia, Pennsylvania 19131.
2. Movant is in the process of filing a Proof of Claim (“POC”) with estimated pre-petition arrears in the amount of \$24,774.20.
3. The Plan currently provides for payment to Movant for pre-peition arrears in the amount of \$22,524.00, which is an amount substantially smaller than Movant’s POC.

4. The Plan fails to cure the delinquency pursuant to 11 U.S.C. § 1322(b)(5).
5. The Plan violates of 11 USC § 1325(a)(5)(B)(ii) by not providing for Movant to receive the full value of its claim.
6. Movant objects to the feasibility of the Plan under 11 U.S.C. § 1325(a)(6). The Plan proposed by Debtor is not feasible. Movant requests that the bankruptcy case either be converted to a Chapter 7 or be dismissed pursuant to 11 U.S.C. § 1307.

WHEREFORE, Movant respectfully requests that this Honorable Court deny confirmation of the Debtor's Chapter 13 Plan.

Respectfully submitted,

Dated: 05/24/17

/s/Danielle Boyle-Ebersole, Esquire  
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